



New York State Commission on
Ethics and Lobbying in Government
540 Broadway
Albany, New York 12207

COMPLAINT

The Commission on Ethics and Lobbying in Government has jurisdiction to investigate potential violations of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, and Legislative Law article 1-A as they apply to State legislators, candidates for the Legislature and legislative employees, as well as the four statewide elected officials, candidates for those offices, executive branch employees, certain political party chairs, and lobbyists and their clients.

COMPLAINANT NAME Elizabeth Bassone *Director - Center for Judicial Accountability, Inc*
 ADDRESS Box 8101
 CITY, STATE, ZIP White Plains, New York 10602
 TELEPHONE 914-421-1200
 EMAIL elera@judgewatch.org

Please provide a statement or description of the alleged violation of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, or Legislative Law article 1-A including facts constituting a violation of the law(s) above, the identity of the individual(s) at issue, the agency where the individual(s) work, and, if possible, a date, time, place of the alleged violation. Also note any documents or exhibits you are including to support the allegations.

See attached
October 29, 2024 conflict of interest /
corruption complaint vs Gov. Hochul, Lt Gov. DeMarco,
Senate Leaders Stewart-Cousins + Ort and all 61
other state senators, Assembly Leaders Heastie +
Barclay and all 148 other Assembly members,
AG James, and Comptroller DiNapoli for their
Public Officers Law 74 Violations pertaining to
the Commission on Legislative, Judicial +
Executive Compensation

Has this matter been referred to any other agency? Yes No
 If yes, which agency? COE Liaison Attorney, Grievance Committees,
State Inspector General, Albany D.A + all 61 other D.A.s,
 Is there pending legal action you are aware of? Yes No US Attorney, NYNY
 If yes, where? USA v. Commission on Legislative, Judicial + Executive Compensation, et al.
Albany County Index # 902654-24
FBI, Justice Dept.



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Complaint Additional Page

This complaint form &
the attached complaint
with substantiating hyperlinks
are affirmed as true
under penalties of perjury,
pursuant to CPLR 2106

[Handwritten Signature]

October 29, 2024
White Plains, NY

CENTER for JUDICIAL ACCOUNTABILITY, INC.

Post Office Box 8101
White Plains, New York 10602

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October 29, 2024

TO: Commission on Ethics and Lobbying in Government (COELIG)

FROM: Elena Ruth Sassower, Director
Center for Judicial Accountability, Inc. (CJA)

RE: Conflict-of-interest/corruption complaint against Governor Hochul, Lieutenant Governor Delgado, Legislators, Attorney General James, and Comptroller DiNapoli for their Public Officers Law §74 Violations Pertaining to the Commission on Legislative, Judicial & Executive Compensation

This is a conflict-of-interest/corruption complaint against the executive and legislative constitutional officers listed on the cover of CJA's January 18, 2024 Opposition Report to the Commission on Legislative, Judicial and Executive Compensation's December 4, 2023 "Report on Judicial Compensation":

Governor Kathy Hochul & Lieutenant Governor Antonio Delgado
All Senators: *c/o* Senate Leaders Andrea Stewart-Cousins & Robert Ort
All Assembly Members: *c/o* Assembly Leaders Carl Heastie & William Barclay
Attorney General Letitia James & Comptroller Thomas DiNapoli.

It is based on their [Public Officers Law §74](#) violations by:

- (1) willfully and deliberately disregarding their constitutional and oversight responsibilities to VOID the Commission's statutorily-violative and fraudulent December 4, 2023 Report based on CJA's January 18, 2024 Opposition Report and to refer the Commission's seven members for criminal prosecution – or for AG James to herself bring such prosecution – *because doing so would expose that prior compensation commission/committee reports, including pertaining to their own salaries, were identically statutorily-violative and fraudulent and that they had corrupted their offices with respect thereto, for years;*
- (2) corrupting the judicial process, by litigation fraud of their attorney, AG James, in CJA's lawsuit suing them based on the January 18, 2024 Opposition Report – *as they had no legitimate defense to the lawsuit and could not otherwise escape accountability;*

- (3) allowing the demonstrably corrupt Commission to proceed to determine *their own executive and legislative salary increases – and in the same statutorily-violative, fraudulent fashion as its December 4, 2023 “Report on Judicial Compensation”*.

You are already familiar with the [January 18, 2024 Opposition Report](#), as you have been “sitting on” [CJA’s January 29, 2024 conflict-of-interest/corruption complaint against the Commission’s seven members](#) based thereon.

The further “specific and credible evidence” supporting this complaint consists of the following, all accessible by the included hyperlinks:

- [CJA’s March 18, 2024 verified petition/complaint](#) in the lawsuit, *CJA v Commission on Legislative, Judicial and Executive Compensation, et al.*, particularizing what transpired in the two months following CJA’s January 18, 2024 Opposition Report, giving rise to the lawsuit;
- the record of the lawsuit, accessible *via* NYSCEF, [Albany County Index #902654-24](#), furnishing a “paper trail” of AG James’ corrupting of the judicial process, in collusion with a judge whose immediate salary interest in the lawsuit was \$20,700 – and ultimately \$101,300, with a “claw-back” liability of over \$500,000;
- [CJA’s October 25, 2024 conflict-of-interest/misconduct complaint against AG James for corrupting the judicial process in CJA v. Commission, et al.](#), filed with the Appellate Division, First Department Attorney Grievance Committee.
- the Commission’s proceedings on legislative and executive compensation, as accessible from its website, www.nyscommissiononcompensation.org.

Pursuant to [Executive Law §§94.10\(d\) and \(f\)](#), “specific and credible evidence” is the predicate for your investigation of complaints, commenced and signified by 15-day letters. The foregoing meets that standard, amply.

I attest that the foregoing is true, under penalties of perjury.

Thank you.

s/Elena Ruth Sassower